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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**SUPPLEMENTAL JOINT SUBMISSION
IN RESPONSE TO DKTS. 242, 242-1, 259
RE: CUSTODIANS AND SEARCH
TERMS**

Referral: Hon. Susan van Keulen, USMJ

1 August 30, 2021

2 Submitted via ECF

3 Magistrate Judge Susan van Keulen
4 San Jose Courthouse
5 Courtroom 6 - 4th Floor
6 280 South 1st Street
7 San Jose, CA 95113

8 Re: Supplemental Joint Submission in Response to Dkts. 242, 242-1, 259 re:
9 Custodians and Search Terms
10 *Brown v. Google LLC*, Case No. 5:20-cv-03664-LHK-SVK (N.D. Cal.)

11 Dear Magistrate Judge van Keulen:

12 Pursuant to Your Honor's August 12, 2021 and August 25, 2021 Discovery Orders (Dkts.
13 242, 242-1, 259), Plaintiffs and Google LLC ("Google") jointly submit this supplemental statement.

14 The parties were able to reach agreement on search terms for the following recently-added
15 custodians: Lorraine Twohill, Arne de Booi, Allan Zhang, Martin Shelton, and Rory McClelland.
16 For the only outstanding disputed custodian (i.e., David Monsees), for whom the parties submitted
17 joint briefing concerning his suitability as an ESI custodian (Dkt. 258), the parties have also reached
18 agreement on the terms to be run in the event that the Court grants Plaintiffs' request over Google's
19 objection.

20 Respectfully,

21 QUINN EMANUEL URQUHART &
22 SULLIVAN, LLP

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24 /s/ Andrew H. Schapiro

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ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Supplemental Joint Discovery Statement. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: August 30, 2021

By /s/ Andrew H. Schapiro
Andrew H. Schapiro
Counsel on behalf of Google LLC